

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA

FILED

2016 APR 27 A 11:02

77851

Inmate Identification Number:

Thomas Callis

(Enter above the full name of the plaintiff  
in this action)U.S. DISTRICT COURT  
N.D. OF ALABAMA  
NOTICE TO FILING PARTY*It is your responsibility to  
notify the clerk in writing of any  
address change.**Failure to notify the clerk may  
result in dismissal of your case  
without further notice.*

vs.

COUNSEL LAURIE ANDRIJESKI  
DISTRICT JUDGE RYAN RUMSEY(Enter above full name(s) of the defendant(s)  
in this action)

## I. Previous lawsuits

- A. Have you begun other lawsuits in state or federal court(s) dealing with the same facts involved in this action or otherwise relating to your imprisonment?  
Yes ( ) No (X)
- B. If the answer to (A) is "yes," describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuit(s) on another piece of paper, using the same outline.)

## 1. Parties to this previous lawsuit:

Plaintiff:

N/A

Defendant(s):

N/A

2. Court (if Federal Court, name the district; if State Court, name the county)

3. Docket number

4. Name of judge to whom case was assigned

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

6. Approximate date of filing lawsuit

7. Approximate date of disposition

II. Place of present confinement

A. Is there a prisoner grievance procedure in this institution?

Yes ( )

No ( ☒ )

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes ( )

No ( ☒ )

C. If your answer is YES:

1. What steps did you take?

2. What was the result?

D. If your answer is NO, explain why not:

Constitutional  
violation

## III. Parties.

In item (A) below, place your name in the first blank and place your present address in the second blank.

A. Name of Plaintiff(s) Thomas Gaddis

Address TALLADEGA COUNTY JAIL  
P.O. BOX B. TALLADEGA, AL 35161

In item (B) below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use Item (C) for the names, positions, and places of employment of any additional defendants.

B. Defendant LAURIE ANDRIJESKE, JUDGE RYAN RUMSEY  
Is employed as JUDICIAL BUILDING TALLADEGA  
at COUNTY AL. PO BOX 183 SYLACAUGA, AL 35150

C. Additional Defendants 256-245 4352

## IV. Statement of Claim

State here, as briefly as possible, the FACTS of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets, if necessary.

And defendant RYAN RUMSEY  
defendant LAURIE ANDRIJESKE, conspired  
together under color of law, in their  
OFFICIAL capacity, deliberately will full  
deprived plaintiff Thomas Gaddis OF MY LIFE  
LIBERTY RESTRAINT ME OF MY LIBERTY. Rights  
Privileges Immunities, defendant ANDRIJESKE

And defendant Rumsey Violated my  
Constitutional Rights SIX Amendment FIFTH  
Amendment Fourteenth Amendment OF EQUAL  
protection And due process OF LAW, 42 USC 1983.

V. RELIEF

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

- ① INJUNCTIVE RELIEF, That STATE DISTRICT COURT Be ordered To give me plaintiff Gaddy's A Hearing, According TO The SIX Amendment
- ② declaratory Judgement, For the pain suffering That were cause, whatsoever The COURT deem Proper And appropriate.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 4-24-2016

Shomari Gaddy  
SIGNATURE

ADDRESS TALLADEGA COUNTY JAIL  
P.O. BOX B.  
TALLADEGA, AL 35161  
AIS # 77851

1054

ON NOV. 2 2015 PLAINTIFF GADDIS WAS ORDERED TO APPEAR IN SYLACAUGA AL. IN DISTRICT COURT IN TALLADEGA COUNTY BEFORE DEFENDANT JUDGE RYAN RUMSEY FOR AN PRELIMINARY HEARING. TO ANSWER THE CHARGE COUNT 1 MANUFACTURE OF AN CONTROLLED SUBSTANCE COUNT 2 POSSESSION OF DRUG PARAPHERNALIA. I WAS APPOINTED DEFENDANT LAURIE ANDRISKE BY DEFENDANT DISTRICT JUDGE RYAN RUMSEY. DEFENDANT ANDRISKE, DEFENDANT RUMSEY INFORMED PLAINTIFF GADDIS THAT THE HEARING WILL BE CONTINUED BECAUSE THE STATE WITNESSES CANNOT BE CONTACTED OR LOCATED. PLAINTIFF GADDIS WERE TRANSFERRED BACK TO TALLADEGA BAIL IN, AWAITING ON THE NEXT PRELIMINARY HEARING. WHILE AWAITING DEFENDANT LAURIE ANDRISKE, DEFENDANT RYAN RUMSEY CONSPIRED TO GATHER AND FILE AN UNCONSTITUTIONAL MOTION ON NOV 9 2015 TO ALLOW A MENTAL EXAMINATION TO TAKE PLACE. THE EXAMINATION WAS SET FOR JAN 6 2016. DEFENDANT ANDRISKE, AND DEFENDANT RUMSEY SHOULD HAVE KNOWN, OR WOULD HAVE KNOWN, THAT ALA RULES OF CRIMINAL PROCEDURE RULE 11 INCOMPETENCY AND MENTAL EXAMINATIONS, DOES NOT APPLY TO PROCEEDINGS IN DISTRICT AND MUNICIPAL COURT. IS RESTRICTED TO THE CIRCUIT COURT. DEFENDANT RUMSEY AND DEFENDANT ANDRISKE TOOK THIS UNCONSTITUTIONAL MENTAL MOTION CONTINUED POSTPONE DELAYED AND FINALLY CLEARED ME PLAINTIFF GADDIS THE RIGHT OF AN HEARING UNDER THE SIX AMENDMENT, CLAUSE ACCUSATION TO BE CONTINUED WITH THE WITNESSES AGAINST HIM TO HAVE COMPULSORY PROCESS FOR OBTAINING WITNESSES IN HIS FAVOR.



AND TO HAVE THE ASSISTANCE OF COUNSEL FOR HIS  
 DEFENSE LAW, PLAINTIFF GADDIS SIX AMENDMENT RIGHT  
 WERE WILLFULLY VIOLATED. DEFENDANT ANDRIJESKI  
 FILE THIS UNCONSTITUTIONAL MENTAL MOTION AND  
 DEFENDANT RUMSEY UPHOLD AND PASS THIS MENTAL  
 MOTION, THREW THE COURT PROCEEDINGS. PLAINTIFF  
 GADDIS WERE NOT NOTIFIED OR INFORMED OF THIS  
 MENTAL MOTION, DEFENDANT ANDRIJESKI WAS ONLY  
 APPOINTED AS STAFF BY COUNSEL, ONLY DEFENDANT  
 ANDRIJESKI DID NOT HAVE THE AUTHORITY TO FILE  
 THIS MOTION. DEFENDANT RUMSEY KNEW, THIS BECAUSE  
 HE ASSIGNED HER ON NOV<sup>TH</sup> 2015. THEREFORE DEFENDANT  
 ANDRIJESKI, AND DEFENDANT RUMSEY CONSPIRED TO  
 GATHER, GATHER MEET IN THE MIND IN THEIR OFFICIAL  
 COMPASSITY WITH AN UNCONSTITUTIONAL MENTAL MOTION  
 TO PLACE PLAINTIFF GADDIS IN AN INCOMPETENCY  
 STATE OF MIND WITH THE INTENT TO CAUSE AND DID  
 INTENT INFLECT INJURY UPON PLAINTIFF GADDIS ①  
 MENTAL PAIN AND SUFFERING ② EMOTIONALLY SUFFERING  
 ③ THREATEN WITH FEAR ④ PLACE MY LIFE IN DANGER  
 ⑤ CAUSE OPPRESSION, DENIED PLAINTIFF GADDIS, PRELIMINARY  
 HEARING, KNOWING THAT SUCH HEARING IN ALA IS A  
 CRITICAL STAGE AND FACTOR IN CRIMINAL CASE BOTH  
 DEFENDANT, ANDRIJESKI DEFENDANT RUMSEY DID NOT  
 PROVIDE THE PROCESS OF LAW OR EQUAL PROTECTION OF  
 LAW. DEFENDANT RUMSEY DEFENDANT ANDRIJESKI  
 PRACTICE WAS UNCONSTITUTIONAL. DEFENDANT RUMSEY  
 DEFENDANT ANDRIJESKI DIDN'T HAVE AN UN-  
 CONSTITUTIONAL PLAN FOR MY LIFE THAT WERE NOT  
 CONSTITUTIONAL

(Statement of Claims)

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(1) Defendant LAURIE ANDRZEJSKI defendant RYAN RAMSEY File That mental motion That were unconstitutional, They violated my Fifth amendment US Constitutional Right provide that no one shall be deprived of his Life Liberty property without due process of Law

(2) When defendant LAURIE ANDRZEJSKI defendant RYAN RAMSEY File That Motion That were Unjust Unconstitutional, They violated my Fourteenth Amendment clause provide that no one shall be deprived of Life Liberty without due process of Law. Equal protection of Law

(3) Defendant RYAN RAMSEY defendant LAURIE ANDRZEJSKI will full violated my six amendment right of the state and District where in the crime shall have been committed denied accusation to be confronted, denied plaintiff Gaddy cross examine the witness against him and obtaining witnesses in plaintiff Gaddy TAYLOR also denied plaintiff Gaddy the assistance of Counsel for my defense,

4. Defendant Ramsey defendant Andrzejski will full deprived of my rights, privileges immunities secured by the constitution plaintiff Gaddy's was restraint of my Liberty, Life Freedom, with prolonged detention That were clearly Unconstitutional Acts, defendants Failure to comply with procedural due process of the six, Fifth and Fourteenth amendment of Equal Protection and due process of Law 42 USC. § 19.83

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defendant LAURIE ANDRIJESKI and defendant RYAN RUMSEY Alleged Conduct When Conspired.

- 1 defendant RUMSEY and defendant ANDRIJESKI should have known that Rule 11. Incompetency Mental Examination does not apply to proceedings in district and municipal court. IS RESTRICTED TO THE CIRCUIT COURT ONLY.
- 2 defendant RUMSEY and defendant ANDRIJESKI should have known that she did not have the authority to file this UNCONSTITUTIONAL MOTION. without my consent defendant ANDRIJESKI were assigned only as standby counsel BY defendant RUMSEY.
- 3 defendant RUMSEY defendant ANDRIJESKI should have known or would have known that plaintiff Gaddis were entitled to and preliminary hearing. BY due process of law, and a SIX Amendment Hearing, within that District of Syracuse AL. The Records will reflect that mental motion postpone delayed and denied Plaintiff Gaddis those Hearings.
- 4 The Plaintiff Gaddis pleaded the defendants alleged conduct when committed violated statutory constitutional rights of which a reasonable person would have known.
- 5 defendant RUMSEY defendant ANDRIJESKI should be held reliable in their official capacity, under color of law 42 USC § 1983

Executed on 4-24-2016 & Thomas D. Davis



(e) Any other sources?

Yes \_\_\_\_\_

No ☒

If the answer to any of the above is "yes," describe each source of money and state the amount received from each during the past twelve months. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

4. How much money do you own or have in any checking or saving accounts, including your prison or jail account? \$ \_\_\_\_\_

5. Do you own any real estate, stocks, bonds, notes, automobiles, boats, or other valuable property (excluding ordinary household items and clothing)? Yes \_\_\_\_\_ No ☒

If the answer is "yes," describe the property and state its approximate value: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

6. List the persons who are dependent upon you for support, stating your relationship to them and how much you contribute toward their support. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

Dated: 4-24-2016

Sharon L. Laddie  
SIGNATURE OF PLAINTIFF

ADDRESS: TALLADEGA COUNTY JAIL  
P.O. BOX B. TALLADEGA AL 35161  
AIS # 77851

★★★ IMPORTANT NOTICE ★★★

Your application to proceed *in forma pauperis* is NOT COMPLETE and WILL NOT BE CONSIDERED by the Court unless the attached page entitled INFORMATION REGARDING PRISONER ACCOUNTS is properly completed and certified.